

560-06/MEU/PLS

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Attorneys for Plaintiff

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Michael E. Unger (MU 0045)

Pamela L. Schultz (PS 8675)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
TITAN MARITIME LTD.,

Plaintiff,

06 cv 13505 (JSR)

-against-

ROTOMAC EXPORT PVT LTD. OF KANPUR,
INDIA a/k/a ROTOMAC EXPORT PVT LTD.
and FROST INTERNATIONAL LTD.,

AFFIDAVIT OF SERVICE

Defendants.

-----X
STATE OF NEW YORK)

ss:

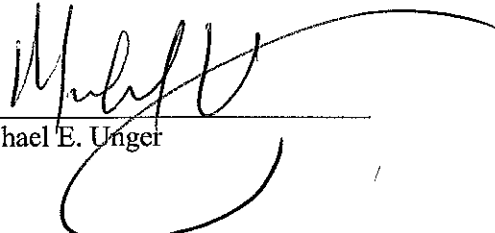
COUNTY OF NEW YORK)

I, Michael E. Unger, after being duly sworn, depose and say that I am not a party to the within action, am over 18 years of age and have an office and place of business at 80 Pine Street, New York, New York 10005. On November 6, 2007, I served the **Notice of Motion, Declaration of Paul Watson, Unger Affirmation and Memorandum of Law in Support of Motion** upon:

Rotomac Export Pvt Ltd.
201 City Centre 63/2, The Mall
Kanpur – 208004 India

Frost International Ltd.
492 Kalpna Plaza 24/147-B
Birhana Road Kanpur 208001 U P India

Via Federal Express (copies of the cover letter dated November 6, 2007, Federal Express tracking receipts and delivery receipts are attached hereto).


Michael E. Unger

Sworn to before me this
6th day of December, 2007.


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November 6, 2007

OUR REF: 560-06/MEU

VIA FEDERAL EXPRESS

Rotomac Export Pvt Ltd.
201 City Centre 63/2, The Mall
Kanpur – 208004 India

Frost International Ltd.
492 Kalpna Plaza 24/147-B
Birhana Road Kanpur 208001 U P India

Re: Titan Maritime Co. Ltd. v. Rotomac Export Pvt Ltd.
"M/V ALINDA"
SDNY: 06 CIV 13505 (JSR)

Dear Sirs,

We herewith forward Plaintiff Titan maritime Co. Ltd.'s motion for an order recognizing and confirming the arbitral award rendered in London, England in its favor and against Rotomac Export Pvt. Ltd. as a judgment of the United States District Court for the Southern District of New York. Enclosed please find the following:

1. Notice of Motion;
2. Declaration of Paul Watson;
3. Unger Affirmation; and
4. Memorandum of Law in Support of Motion.

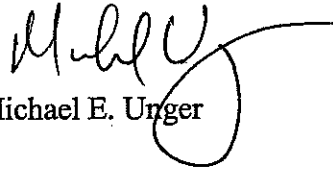
November 6, 2007

Page 2

We also enclose a copy of Judge Rakoff's Order dated November 5, 2007 pursuant to which your papers in opposition, if any, are to be filed with the Court and served upon the undersigned by November 30, 2007. Please note the Court has scheduled oral argument in this motion for December 19, 2007 at 2:00 pm in Courtroom 14B, 500 Pearl Street, New York, New York 10007, U.S.A.

Very truly yours,

FREEHILL HOGAN & MAHAR LLP

A handwritten signature in black ink, appearing to read 'Michael E. Unger', with a large, stylized loop at the end.

Michael E. Unger

MEU/mc

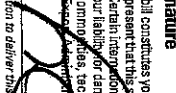
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<p>6 Special Handling</p> <p><input type="checkbox"/> HOLD at FedEx Location</p> <p><input type="checkbox"/> SATURDAY Delivery</p> <p><small>Available to select customers for FedEx Intl. Priority only</small></p>					
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Delivery date Nov 12, 2007 10:15 AM

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Destination KANPUR IN
Delivered to Receptionist/Front Desk
Service type Priority Envelope
Weight 0.7 lbs.

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Date/Time	Activity	Location	Details
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Nov 10, 2007 5:35 PM	Delivery exception	AMRITSAR IN	Holiday - Business closed
Nov 10, 2007 5:35 PM	At local FedEx facility	AMRITSAR IN	
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Nov 8, 2007 6:17 PM	In transit	NEW DELHI IN	
Nov 8, 2007 5:38 PM	At dest sort facility	NEW DELHI IN	
Nov 8, 2007 5:38 PM	In transit	NEW DELHI IN	Package available for clearance
Nov 8, 2007 4:15 AM	In transit	PARIS FR	
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Nov 7, 2007 10:39 PM	Departed FedEx location	PARIS FR	
Nov 7, 2007 8:02 PM	Arrived at FedEx location	PARIS FR	
Nov 7, 2007 4:44 AM	Departed FedEx location	MEMPHIS, TN	
Nov 7, 2007 12:12 AM	Arrived at FedEx location	MEMPHIS, TN	
Nov 7, 2007 12:19 AM	Departed FedEx location	NEWARK, NJ	
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 Company FEOST International LTD
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3 Shipment Information
 Recipient's Tax ID number for Customs purposes _____
 e.g. GST/VAT/IDT/IDT, or as locally required
 Total Packages _____ Total Weight _____ lbs. _____ kg. _____ DIM _____ in. _____ cm.
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 Value for Customs REQUIRED _____
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Reference 560-06 / MSX
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Delivered to Receptionist/Front Desk
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10:54 AM	On FedEx vehicle for delivery	KANPUR IN	
Nov 10, 2007 5:35 PM	Delivery exception	AMRITSAR IN	Holiday - Business closed
5:35 PM	At local FedEx facility	AMRITSAR IN	
Nov 9, 2007 11:21 AM	In transit	NEW DELHI IN	
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8:01 PM	Arrived at FedEx location	PARIS FR	
4:44 AM	Departed FedEx location	MEMPHIS, TN	
12:12 AM	Arrived at FedEx location	MEMPHIS, TN	
12:19 AM	Departed FedEx location	NEWARK, NJ	
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